

EXHIBIT 10

From: Gonzalez, Arturo J.
Sent: Saturday, June 17, 2017 9:40 AM
To: 'Felipe Corredor'; Yang, Michelle C.Y.; QE-Waymo
Cc: 'BSF_EXTERNAL_UberWaymoLit@bsflp.com'; UberWaymoMoFoAttorneys; 'DG-GPOttoTruckingWaymo@goodwinlaw.com'; John Cooper (JCooper@fbm.com); MCate@fbm.com
Subject: Waymo v. Uber - Defendant Uber's First Set of Interrogatories

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Felipe,

We have a number of concerns regarding these responses, but this email addresses Interrogatory No. 11 and Waymo's related failure to produce any documents regarding side businesses (except those pertaining to AL). Your response to No. 11 says that what we seek is not relevant. If that is the case, then why did you produce Waymo's policies and procedures pertaining to side businesses, along with AL's side business documents?

The only other specific objection that you make to No. 11 is a proportionality objection. Please explain how that objection prevents you from responding to this simple interrogatory which only requires you to identify the names of the senior executives with side businesses.

In a further attempt to confer on this issue, please address the following. At trial, does Waymo plan to raise either of these issues: (1) that AL improperly met with Uber while he was still employed by Waymo, or (2) that AL did not follow the proper procedures for entering into a side business, or otherwise "hid" from Waymo that he was engaged in side business activity?

Because Waymo has been consistent in its refusal to provide any information regarding the activities of other employees in side businesses, we have reached out to the Special Master to request that this matter be added to the issues we will be arguing to Magistrate Corley on Friday. I am available today or tomorrow to confer live if that is preferable. But please respond in writing to this email so that your position is clear.

Finally, I should note that we are trying to obtain the information that we need via alternative avenues of discovery. Should you continue to stonewall, we will have no alternative but the question the executives themselves regarding their side businesses and the communications they had with Waymo pertaining to those side businesses.

Arturo

From: Felipe Corredor [mailto:felipecorredor@quinnemanuel.com]
Sent: Friday, June 16, 2017 11:18 PM
To: Yang, Michelle C.Y.; QE-Waymo
Cc: 'BSF_EXTERNAL_UberWaymoLit@bsflp.com'; UberWaymoMoFoAttorneys; 'DG-GPOttoTruckingWaymo@goodwinlaw.com'
Subject: RE: Waymo v. Uber - Defendant Uber's First Set of Interrogatories

- External Email -

Counsel,

Please find attached Waymo's responses and objections to Uber Technologies, Inc.'s First Set of Interrogatories (Nos. 1-11). Please note that these have been marked as Highly Confidential – Attorneys' Eyes Only under the Protective Order.

Regards,
Felipe

Felipe Corredor

Associate,

Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6448 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
felipecorredor@quinnemanuel.com
www.quinnemanuel.com

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From: Yang, Michelle C.Y. [<mailto:MYang@mofo.com>]

Sent: Wednesday, May 17, 2017 7:04 PM

To: QE-Waymo <gewaymo@quinnemanuel.com>

Cc: 'BSF_EXTERNAL_UberWaymoLit@bsflp.com' <BSF_EXTERNAL_UberWaymoLit@bsflp.com>;

UberWaymoMoFoAttorneys <UberWaymoMoFoAttorneys@mofo.com>; 'NChatterjee@goodwinlaw.com'

<NChatterjee@goodwinlaw.com>; 'BSchuman@goodwinlaw.com' <BSchuman@goodwinlaw.com>;

'SBrun@goodwinlaw.com' <SBrun@goodwinlaw.com>; 'RWalsh@goodwinlaw.com' <RWalsh@goodwinlaw.com>

Subject: Waymo v. Uber - Defendant Uber's First Set of Interrogatories

Counsel,

Attached please find Defendant Uber Technologies, Inc. First Set of Interrogatories (Nos. 1-11). The interrogatories do not contain Uber confidential or AEO information.

Best regards,
Michelle

Michelle Yang

Morrison & Foerster LLP

2000 Pennsylvania Avenue, NW | Washington, DC 20006-1888

P: +1 (202) 887.1537 | F: +1 (202) 785.7580 | C: +1 (415) 866.7219

MYang@mofo.com | www.mofo.com

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